



ENZYMATIC THERAPY

What **Better** feels like.™

January 1, 2006

Office of Nutritional Products, Labeling &
Dietary Supplements, HFS 810
Center for Food Safety and Applied Nutrition
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740

RE: Label Claims/Disclaimers

Dear Sir or Madam:

This letter is to notify you that the following product is Manufactured, Packed, and/or Distributed by Enzymatic Therapy, Inc. at 825 Challenger Drive, Green Bay, Wisconsin 54311 has a label that contains a statement provided by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. Enzymatic Therapy, Inc. wishes to take advantage of the exemption to section 201(g)(1)(C) of the act and comply with section 403(r)(6) of the act. These claims are not necessarily for a product we currently market or plan to market in the immediate future, and may be exploratory in nature.

<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Brain Fog Lifter™*	L-glutamine is the most abundant amino acid in the body. Studies suggest it may help protect neural cells.*	L-Glutamine, Lecithin

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: Robert Doster

Robert Doster

Title: Senior Vice President of Scientific Affairs

Date: 1-1-06

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608.

Sincerely,

Michael P. Devereux

Michael P. Devereux
Chief Operations Officer

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ENZYMATIC THERAPY

ACCELERATED

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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Brain Fog Lifter™*	Clinical studies show high-quality extracts of Eleuthero can restore vitality; increase feelings of energy; increase mental and physical performance; and improve the body's response to stress.*	Eleuthero Root (Eleutherococcus senticosus) Extract

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: 

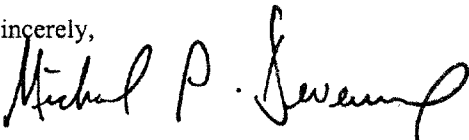
Robert Doster

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If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608.

Sincerely,


Michael P. Devereux
Chief Operations Officer

INTEGRATIVE THERAPEUTICS INC.™
NF Formulas • PhytoPharmica
Tyler Encapsulations • Vitaline Formulas

9755 SW Commerce Circle, Suite B2
Wilsonville, OR 97070
P: 503.582.8386 F: 503.582.0467

ENZYMATIC THERAPY®
&
PHYTOPHARMICA®

825 Challenger Drive, Green Bay, WI 54311-8328
P: 920.469.1313 F: 888.570.6460 (Enzymatic)
P: 920.469.9099 F: 920.469.4418 (Phyto)



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January 4, 2006

Office of Nutritional Products, Labeling &
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Center for Food Safety and Applied Nutrition
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5100 Paint Branch Parkway
College Park, MD 20740

RE: Label Claims/Disclaimers

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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Brain Fog Lifter™*	Bilberries contain powerful antioxidants that protect neuronal cells from oxidative damage.*	Bilberry Fruit (Vaccinium myrtillus) Extract

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: 

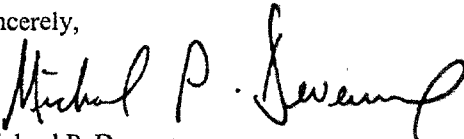
Robert Doster

Title: Senior Vice President of Scientific Affairs

Date: 1-4-06

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608.

Sincerely,


Michael P. Devereux
Chief Operations Officer